

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DOCKET NO. 04-10781JLA

RANDY L. HANCOCK,
Plaintiff,

v.

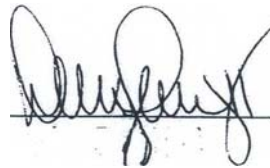
PRINCETON PROPERTIES MANAGEMENT, INC.,
d/b/a PRINCETON PROPERTIES APARTMENTS, and
CHRISTIAN H. GARGUREVICH,
Defendants

NOW come the parties in the above referenced matter and respectfully request this Honorable Court allow discovery to continue through August 31, 2005. As grounds therefor, the parties state that all witness depositions are scheduled to be taken by August 9, 2005. The parties desire the additional three weeks to conduct any additional depositions or discovery that may become necessary as a result of the presently scheduled testimony.

The parties had attempted to complete discovery well before expiration of the discovery order but were unable to do so because of scheduling complications. Counsel for the defendant Princeton Properties was out of work for several weeks due to the severe illness and subsequent death of her father and illness of her mother which required round the clock care. For that reason, the parties were unable to arrange for the depositions until late July/early August. As stated above, the depositions are scheduled to be completed within the next two weeks. The parties merely wish to be certain that all discovery is complete within timelines approved by the Court.

For the reasons set forth above, the parties respectfully request an extension of the time in which to complete discovery to September 15, 2005.

Respectfully submitted,
The Defendant,
Princeton Properties Management, Inc.,
By its Attorney,



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Assented to:

Mark Shuman, Esquire
For the plaintiff



Robert Turner, Esquire
For Roland Fong (Greatscapes)



CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney(s) of record for each party by mail on 2005-08-02.

